

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ETHLOKIA PLUMBER <i>ex rel.</i> K.W.	§	
	§	
<i>Plaintiffs,</i>	§	
v.	§	Civil Action No. 4:20-CV-00672
	§	
HARRIS COUNTY DEPARTMENT	§	
OF EDUCATION,	§	
	§	
<i>Defendant.</i>	§	

NOTICE OF DEPOSITION

Please take notice that on Tuesday, June 1, 2021, or a mutually agreeable date, commencing at 9:30 a.m., the undersigned will take the deposition of the Harris County Department of Education before a certified court reporter.

List of Topics for Harris County Department of Education Representative:

1. Knowledge of HCDE's policies and procedures relating to the use of restraint;
2. Knowledge of reports and complaints made to HCDE regarding the use of unlawful restraints;
3. Knowledge of reports and complaints made to HCDE regarding injuries resulting from the restraint of students;
4. Knowledge of the discipline and/or termination of staff relating to the restraint of students;
5. Knowledge of investigations and/or reports by third parties relating to the restraint of students.
6. Knowledge of training provided to HCDE staff on the use of restraints.

Please take further notice that:

1. The deposition may be conducted remotely, using audio-visual conference technology;
2. The court reporter may report the deposition from a location separate from the witness;

3. Counsel for the parties and their clients may be participating from various, separate locations;
4. The court reporter may administer the oath to the witness remotely;
5. Each participating attorney may be visible to all other participants, and their statements will be audible to all participants;
6. All exhibits may be provided simultaneously and electronically to the witness and all participants;
7. The court reporter may record the testimony using stenography;
8. The deposition may be recorded electronically;
9. Counsel for all parties will be required to stipulate on the record:
 - a. Their consent to this manner of deposition; and
 - b. Their waiver of any objection to this manner of deposition, including any objection to the admissibility at trial of this testimony based on this manner of deposition.

Please contact the noticing attorney at least five calendar days prior to the deposition to confirm the identity and contact information of those who will be attending the deposition on behalf of Harris County Department of Education so that the necessary credentials, call-in numbers, firm name, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding.

Respectfully submitted,

/s/L. Kym Davis Rogers

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on all known counsel of record via email on May 20, 2021.

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